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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEBYOU SOLOMON, an individual,
Plaintiff,
vs.

Case. No.: 2:19-cv-00652-JAD-DJA

**JOINT MOTION TO EXTEND THE
DEADLINE FOR:**

- 1) **PLAINTIFF'S RESPONSE TO
DEFENDANT UNIVERSAL
PROTECTION SERVICE, LLC'S
MOTION TO DISMISS
PLAINTIFF'S THIRD
AMENDED COMPLAINT (ECF
No. 62) (FOURTH REQUEST)**
and;
- 2) **PLAINTIFF'S RESPONSE TO
FASHION SHOW MALL, LLC'S
MOTION TO DISMISS
PLAINTIFF'S THIRD
AMENDED COMPLAINT (ECF
No. 71) (THIRD REQUEST)**

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JOSEPH LOMBARDO,
individually and in his official capacity as
Sheriff; JOHN L. PELLETIER, an
individual; RICHARD E. MAUPIN, an
individual; RYAN J. FRYMAN, an
individual; JUAN D. CONTRERAS, an
individual; ALLEN J. PAVESE, an
individual; BRANDON M. MEADS, an
individual; FASHION SHOW MALL, LLC,
a Nevada limited-liability company;
UNIVERSAL PROTECTION SERVICE,
LLC, a Nevada limited-liability company;
ANDREW ANTONIO, an individual,
EDUARDO AGUILAR, an individual,
DOES I – V, individuals,
Defendants.

ECF Nos. 81, 82

Pursuant to Local Rule 7-1(c), Plaintiff NEBYOU SOLOMON, Defendant
UNIVERSAL PROTECTION SERVICE, LLC, and Defendant FASHION SHOW MALL,
LLC, by and through their respective counsel, hereby move and request that this Court extend
the deadline to file the following:

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1 1) Plaintiff's Response to Defendant Universal Protection Service, LLC's
2 Motion to Dismiss Plaintiff's Third Amended Complaint (ECF No. 62), filed on April 7,
3 2020, by an additional 28 days, extending the deadline from July 2, 2020 to July 30, 2020.
4 This is the fourth request for an extension of time for Plaintiff to file his Response.

5 2) Plaintiff's Response to Fashion Show Mall, LLC's Motion to Dismiss Third
6 Amended Complaint (ECF No. 71), filed on April 21, 2020, by an additional 28 days,
7 extending the deadline from July 2, 2020 to July 30, 2020. This is the third request for an
8 extension of time for Plaintiff to file his Response.

9 These requests for an extension of time are not sought for any improper purpose or
10 other purpose of delay. These requests are based upon the following:

11 Plaintiff and Defendants Universal Protection Service, LLC and Fashion Show
12 Mall, LLC are actively engaged in settlement discussions. A draft settlement agreement has
13 recently been circulated, which requires review by the parties and their counsel.

14 THEREFORE, the parties respectfully request that this Court extend the deadline
15 to file Plaintiff's Responses to 1) Defendant Universal Protection Service, LLC's Motion to
16 Dismiss Plaintiff's Third Amended Complaint (ECF No. 62) and; 2) Fashion Show Mall,
17 LLC's Motion to Dismiss Third Amended Complaint (ECF No. 71) up to and including July
18 30, 2020.

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Nebyou Solomon v. Las Vegas Metropolitan Police Department, et al.
Case No.: 2-19-cv-00652-JAD-DJA

IT IS SO STIPULATED.

DATED this 2nd day of July, 2020.

MCLETCHE LAW

/s/ Leo S. Wolpert
Margaret A. McLetchie, NBN 10931
Alina M. Shell, NBN 11711
Leo S. Wolpert, NBN 12658
701 E. Bridger Ave., Suite 520
Las Vegas, NV 89101
Attorneys of Plaintiff Nebyou Solomon

DATED this 2nd day of July, 2020.

**WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC**

/s/ Jeremy R. Alberts
Jeremy R. Alberts, NBN 10497
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Attorneys for Defendant
Universal Protection Service LLC

DATED this 2nd day of July, 2020.

KAEMPFER CROWELL

/s/ Bryan M. Viellion
Anthony J. Celeste, NBN 8776
Bryan M. Viellion, NBN 13607
1980 Festival Plaza Dr., Suite 650
Las Vegas, Nevada 89135
Attorneys of Defendant Fashion Show Mall LLC

ORDER

IT IS SO ORDERED.


HONORABLE JUDGE JENNIFER A. DORSEY
U.S. DISTRICT COURT JUDGE

7-2-2020
DATED: _____